

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Case No.: 23-10678-pb

Chapter 11

ZHANG MEDICAL P.C. d/b/a NEW HOPE
FERTILITY CLINIC,

Debtor
-----x

MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Erika E. Barnes, request admission, *pro hac vice*, before the
Honorable Philip Bentley, to represent Pension Benefit Guaranty Corporation, a
Creditor in the above-referenced ☒ case ☐ adversary proceeding.

I certify that I am a member in good standing of the bar in the
District of Columbia and, if applicable, the bar of the U.S. District Court for the _____
District of _____.

I have submitted the filing fee of ~~\$XXXX~~ with this motion for *pro hac vice* admission. *

*PBGC is a U.S. Government agency and is exempt from paying filing fees.

Dated: 05/16/2023

Washington, DC, ~~New York~~

/s/ Erika E. Barnes

Mailing Address:

Pension Benefit Guaranty Corporation

Office of the General Counsel

445 12th Street, SW, Washington, DC 20024

E-mail address: barnes.erika@pbgc.gov

Telephone number: (202) 229-3460